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2	Shannon K. Emmons (Admitted Pro Ha	c Vice)					
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8	Attorneys for Defendant						
9	H. THOMAS MORAN, II, Court-Appo Receiver of LYDIA CAPITAL, LLC	ointed					
10	IN THE UNIT	TED STATES	S DISTRICT COURT				
11	FOR THE SOUTHERN DISTRICT OF CALIFORNIA						
12	THE LINCOLN NATIONAL LIFE INSURANCE COMPANY,	Case I	No. 08-CV-0023-IEG-	NLS			
13							
14	Plaintiff, v.	JOIN	T MOTION OF PLA	INTIFF, THE			
15			OLN NATIONAL LI PANY AND DEFEN				
16		THO	MAS MORAN, II, CO DINTED RECEIVER	OURT-			
17		CAPI	TAL, LLC, FOR TH	E EXTENTION OF			
18		PART	E TO AMEND PLEA FIES	DINGS TO ADD			
19 20	H. THOMAS MORAN, II, Court-Appel Receiver of LYDIA CAPITAL, LLC,	ointed					
21	Defendant.						
22		<u></u>					
23	Plaintiff, The Lincoln Nationa	l Life Insura	nce Company ("Linco	oln") and Defendant, H.			
24	Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC (the "Receiver"), respectfully						
25 26	request the Court to extend the time to amend the pleadings to add parties from July 11, 2008, to						
20 27	August 29, 2008. Lincoln and Moran jointly seek this extension of time because they are currently						
28	engaged in indemnification discussions	with the insur	rance policy's insured,	trustee and agent; and, at			
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the conclusion of these discussions, the insured, trustee and agent may be proper parties to this 1 2 lawsuit. Lincoln and Moran, therefore, respectfully request that the Court extend the time to add 3 parties from July 11, 2008, to August 29, 2008. 4 WHEREFORE, Plaintiff, The Lincoln National Life Insurance Company and Defendant, H. 5 6 Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC, respectfully request that the 7 Court enter an Order granting an extension of time to amend the pleadings to add parties from 8 July 11, 2008, to August 29, 2008. 9 Respectfully submitted, 10 s/ Jason P. Gosselin s/ Shannon K. Emmons 11 Jason P. Gosselin (admitted pro hac vice) Melvin R. McVay, Jr. (Admitted Pro Hac Vice) Heath M. Lynch (admitted pro hac vice) Shannon K. Emmons (Admitted Pro Hac Vice) 12 DRINKER BIDDLE & REATH LLP PHILLIPS McFall McCaffrey McVay One Logan Square 13 & MURRAH, P.C. 18th & Cherry Streets Corporate Tower / Thirteenth Floor 14 Philadelphia, PA 19103-6996 101 North Robinson Telephone: (215) 988-2700 Oklahoma City, Oklahoma 73102 15 Email: Telephone: (405) 235-4100 Facsimile: (405) 235-4133 16 Email: Mrmcvay@phillipsmcfall.com 17 Skemmons@phillipsmcfall.com 18 H. Christian L'Orange Richard M. Valdez, CA. Bar No. 156957 S. Fey Epling James G. Sandler, CA. Bar No. 067407 19 DRINKER BIDDLE & REATH LLP SANDLER, LASRY, LAUBE, BYER & VALDEZ LLP 50 Freemont Street, 20th Floor 402 West Broadway, Suite 1700 20 San Francisco, CA 94105-2235 San Diego, California 92101 21 Telephone: (415) 591-7500 Telephone: (619) 235-5655 Facsimile: (415) 591-7510 Facsimile: (619) 235-5648 22 Email: Christian.Lorange@dbr.com Email: Rvaldez@sllbv.com Jgsandler@sllbv.com Fey.Epling@dbr.com 23 Attorneys for Plaintiff Attorneys for H. Thomas Moran, II, Court-24 The Lincoln National Life Insurance Appointed Receiver of Lydia Capital, LLC 25 Company 26 27 28

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